



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 29, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Winn Telephone Company
Study Area Code 310737**

Dear Ms. Dortch:

On behalf of Winn Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Roger Stoudt
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	rstoudt@winncommunications.net
	Form Type	54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
310737mi510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	---------------------------------------	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	310737mi610.pdf

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

[illegible]

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010> Study Area Code	310737
<015> Study Area Name	WINN TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035> Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

Saginaw Chippewa Indian Tribe

<920> Tribal Government Engagement Obligation

310737mi920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification No

<1030> Attach detailed description for broadband comparability compliance

WINNmi1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.winntelephone.com

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<p><2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2024A> Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2025A> Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<input style="width: 100px; height: 20px;" type="text"/>	

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	310737mi3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input checked="" type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	310737mi3026.pdf

REDACTED FOR PUBLIC INSPECTION

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	---

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
---	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
---	--	--

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@wincommunications.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	310737
<015> Study Area Name	WINN TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035> Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	WINN TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/28/2017
Printed name of Authorized Officer:	Mark Graf
Title or position of Authorized Officer:	General Manager
Telephone number of Authorized Officer:	9899539876 ext.
Study Area Code of Reporting Carrier:	310737 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	WINN TEL CO
Name of Authorized Agent Firm:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/28/2017
Name of Authorized Agent Employee:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	310737 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Winn Telephone Company's Demonstration of Compliance with Service Quality Standards and Consumer Protection Rules for Voice and Broadband Services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Winn Telephone Company (“Company”) hereby certifies that it is complying with state and federal service quality standards and consumer protection rules. The Company is subject to consumer protection obligations for voice services under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Michigan Public Service Commission (MPSC), as specified in Section 202(b) of the Michigan Telecommunications Act (MTA) and MPSC Case No. U-11103, which disclose rates, terms and conditions of service to customers; (2) adherence to Michigan state consumer protection requirements governing telephone providers, Prohibitions as identified in Sections 305 and 502 of the MTA, Costing

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

Procedures as determined by the MPSC in Case No. U-11103, and Compliance with Anti-Slamming Procedures as adopted in MPSC Case No. U-11757 and Case No. 11900; and (3) CPNI, Red Flag Rules and other federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**Winn Telephone Company's Demonstration of Ability to Function in
Emergency Situations:**

Winn Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Michigan Telecommunications Act (MTA). The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c Emergency power requirements; compliance. The Company complies with the FCC's backup power requirements, effective October 16, 2015.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 310737

<015>	Study Area Name	WINN TEL CO
-------	-----------------	-------------

<020> Program Year 2018

<030> Contact Name - Person USAC should contact regarding this data Roger Stoudt

<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> rstoudt@winncommunications.net

1/1/2017

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	310737
<015>	Study Area Name	WINN TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roger Stoudt
<035>	Contact Telephone Number - Number of person identified in data line <030>	9898662421 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rstoudt@winncommunications.net

<810>	Reporting Carrier	Winn Telephone Company
<811>	Holding Company	Winn Communications
<812>	Operating Company	Winn Telephone Company

[illegible]



REDACTED FOR PUBLIC INSPECTION

PO Box 387
2766 W Blanchard
Winn, MI 48896
989-866-2421

May 12, 2017

Frank Cloutier , Chief
Saginaw Chippewa Indian Tribe
7070 E Broadway Rd
Mt Pleasant, MI 48858

Dear Chief Cloutier:

Winn Telephone Company (Winn), an independent telecommunications provider serving the Isabella County, Michigan area, wishes to engage with the Saginaw Chippewa government about some potential opportunities for broadband expansion on Tribally-owned lands (The Isabella Reservation) within our service area. Winn has been providing telecommunications services to the area for almost 100 years, and we are interested in learning about any additional telecommunications and broadband needs that your community may have.

In November 2011, the Federal Communications Commission (FCC) comprehensively reformed the Universal Service Fund (USF) which helps companies like Winn provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage with Tribal leaders about broadband deployment on Tribally-owned lands and report annually on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy (ONAP) issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments. These outreach and engagement activities must take place annually.

Winn is pleased to invite you and other leaders from the Saginaw Chippewa government to discuss additional ways that we can meet your telecommunications and broadband needs. Specifically, Winn would like to discuss the following items:

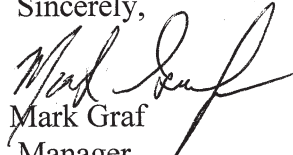
- Needs assessment and deployment planning focused on anchor institutions (such as schools, libraries and health centers);
- Feasibility and sustainability planning;
- Marketing services in a culturally sensitive manner;
- Rights of way, permitting, facilities siting, environmental and cultural preservation processes;
- Compliance with Tribal business licensing requirements.

Winn is interested in learning whether your community has any specific broadband needs that our company may be able to meet, depending on the scope and scale of the project. For example, are there any members of your community within our service area who currently do not have access to broadband? Are there any needs such as distance learning or tele-medicine that Winn could help facilitate? We also want to make sure that we continue to respect your cultural heritage, property rights, business customs, and any other rules and procedures of your government.

Winn is a locally-owned company. We are dedicated to serving and employing members of our community and we want to ensure that residents and businesses on the Isabella Reservation within our service area are receiving the best voice and broadband services that we can offer.

Winn extends this invitation to set up an in-person meeting or conference call with members of your Tribal government at your earliest convenience. Please contact Mark Graf manager at telephone # 989-953-9876 or email mgraf@winncommunications.net. We look forward to discussing this important issue with you.

Sincerely,


Mark Graf
Manager
Winn Telephone Co

Winn Telephone Company (SAC 310737)

Response to Line 1030 – Broadband Rate Comparability

Winn can provide 10/1 Mbps unlimited broadband, which is available to all customers in its study area, at a rate of \$99.95. This rate is higher than the FCC's benchmark rate for 10/1 Mbps unlimited broadband. Winn is located in a very rural part of Michigan, and the costs to deploy broadband are much higher than in more densely populated areas. Winn's customer density is very low, which makes it difficult for the company to recoup costs of deploying broadband networks. As such, Winn chose a rate that it felt was both reasonable for its customers and provided some ability for the company to recover its investments.

Winn Telephone Company (SAC 310737)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Winn Telephone Company hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY